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May 16, 2025

Via ECF

The Honorable Alvin K. Hellerstein
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re. United States v. Jefry Bueno Guzman
25 Cr. 215 (AKH)

*So ordered
S-19-25
Alvin K. Hellerstein*

Dear Judge Hellerstein,

I write with the consent of the government to respectfully request an adjournment of the scheduled dates for the Presentence Investigation Report (PSR) in this matter.

On May 13, 2025, Mr. Bueno Guzman entered a plea of guilty before Magistrate Judge Figueredo to one count of mail theft, in violation of 18 U.S.C. § 1708, which the parties will shortly ask this Court to accept. Sentencing has been scheduled for October 22, 2025. Under the standard timeline for PSRs in this District, the Probation Department is required to complete its investigation and disclose the PSR by early August 2025.

The defense respectfully requests that the standard deadlines for the PSR be adjourned by 45 days to permit Mr. Bueno Guzman to continue to build on his recent positive progress and to allow defense counsel to have an expert evaluation of Mr. Bueno Guzman be completed and provided to the Probation Department. If granted, this adjournment would still provide for the PSR to be disclosed one month before sentencing.

Accordingly, we respectfully request that the Court adjourn the PSR deadlines to the following dates:

- Defendant interview by July 28, 2025
- First disclosure by August 25, 2025
- Second disclosure by September 22, 2025

We thank the Court for its consideration of this request.

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Respectfully submitted,

/s/

Neil P. Kelly
Assistant Federal Defender
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cc: AUSA William Kinder